

# Exhibit “B”

## Katherine Taylor’s Affidavit

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

RICHARD WAYNE WRIGHT, SR., )

Plaintiff, )

v. )

SYLVESTER NETTLES, et al., )

Defendants. )

CIVIL ACTION NO.  
2:05-CV-439-A

**AFFIDAVIT OF KATHERINE TAYLOR**

STATE OF ALABAMA )

COUNTY OF BULLOCK )

Before me, the undersigned Notary Public, personally appeared KATHERINE TAYLOR who, after being duly sworn, states as follows:

1. My name is Katherine Taylor. I am over the age of nineteen (19) years and have personal knowledge of the information contained in this affidavit.

2. I am a certified nurse currently working at the Bullock Correctional Facility ("Bullock") for Prison Health Services, Inc. ("PHS"). I have been employed at Bullock since January 1, 2000.

3. Richard Wayne Wright ("Wright") was at one time an inmate incarcerated at Bullock. Wright is not incarcerated at Bullock at this time.

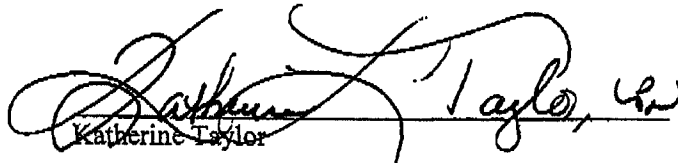
4. When an inmate has a non-emergency medical or health problem and/or complaint, an inmate may file a sick call request form in order to bring this problem or complaint to the attention of the medical staff at Bullock and/or request medical treatment for this problem.

The sick call request process is well-known at Bullock and is utilized by inmates at Bullock on a daily basis. When an inmate first arrives at Bullock, he is taken to the Health Care Unit to be processed in the system and receive an orientation as to the availability of medical services at the facility as well as the procedures for obtaining medical care. During this orientation, the medical staff gives each inmate an information sheet and verbally goes through the sheet with newly-arriving inmates, informing them how to utilize the sick call request form process. Sick call request forms are available at the Health Care Unit or Alabama Department of Corrections ("ADOC") shift commander's office at Bullock. An inmate making a sick call request is required to complete the top portion of the sick call request form (stating his name, the date of request, AIS number, date of birth, dorm location, the nature of the problem or request and his signature) and submit the sick call request form by placing it in a locked box located outside the facility's health care unit. Sick call request forms are then brought to the Health Care Unit. The sick call request forms are removed from the locked box each day at approximately 12:00 p.m. and marked as received by the medical records clerk or a nurse at that time. Upon reviewing the sick call request forms, the medical staff compiles a list of inmates having submitted sick call request forms, which is then provided to correctional officers in the various dorms at Bullock who are responsible for notifying inmates in the particular dorms that sick call has begun. Inmates who submit sick call request forms are responsible for reporting to the Health Care Unit for evaluation of their complaints at the time they are summoned to the Health Care Unit for sick call. The nurse conducting sick call takes reporting inmates' vital signs and either: (1) provides an inmate with medical treatment that can be provided under the nursing protocols, or (2) refers the inmate to the physician or nurse practitioner on staff at Bullock. If an inmate submits more than one (1) sick call request form on the same day, the nurse will only fill in the intake

information on one (1) sick call request form regarding the inmate's subjective complaints, objective vital signs, assessment and plan. If the inmate fails to report to sick call when summoned, this is often indicated in the sick call request form because the sick call request form is left blank, i.e. not completed, by the medical staff. If the medical complaints or problems identified by an inmate in a sick call request form appear to be urgent or life-threatening, the medical staff will immediately have the inmate brought to the Health Care Unit and the inmate will not be required to wait until sick call begins.

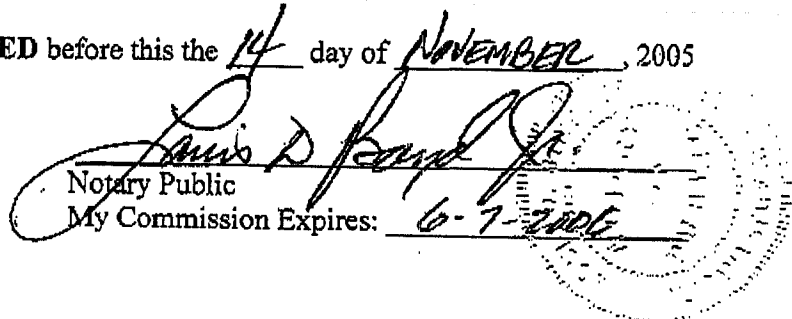
5. PHS's physicians, nurse practitioners, nurses and other medical personnel at Bullock have responded in a timely and appropriate manner to the requests for medical treatment submitted by Wright during his incarceration. The medical staff at Bullock has not ignored any of Wright's medical complaints or refused in any way to provide him with any necessary medical treatment. On each occasion that Wright has made medical complaints, the medical staff has provided Wright with timely and appropriate medical care and treatment for his problems.

Further affiant saith not.

  
Katherine Taylor

SWORN TO and SUBSCRIBED before this the 14 day of NOVEMBER, 2005

(SEAL)

  
Notary Public  
My Commission Expires: 6-7-2006